

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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KARIN MURPHY CARO,

*Plaintiff,*

*-against-*

ANSWER

Index No. 16-CV-7047

THOMAS J. SPOTA, DISTRICT ATTORNEY,  
SUFFOLK COUNTY, SUFFOLK COUNTY  
POLICE DEPARTMENT, COUNTY OF SUFFOLK  
DAVID A. MURRAY, EDWINY. HUGH, JOHN P.  
RICHARD MARRA, WILLIAM MURPHY,  
ALEXANDER J. CARO, KARIN SPEER and  
LAUREN DOSKOEZ,

*Defendants.*

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Defendant, ALEXANDER J. CARO, by his attorney, William C.  
Goggins, in answering the Complaint of the Plaintiffs:

1. Denies each and every allegation of the complaint contained in paragraphs 37, 38, 48, 61, 64, 70, 71, 72, 73, 76, 81, 84, 91, and 146.
2. Denies knowledge and information sufficient to form a belief as to the truth of the allegations of the complaint contained in paragraphs 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 24, 25, 26, 27, 28, 29, 30, 33, 36, 39, 40, 41, 42, 43, 44, 46, 47, 49, 50, 51, 52, 53, 54, 55, 56, 57, 59, 60, 62, 63, 65, 66, 67, 68, 74, 75, 77, 78, 79, 80, 83, 85, 86, 87, 88, 89, 90, 92, 93, 94, 95, 96, 97, 99, 100, 101, 102, 103, 104, 105, 107, 108, 109, 110, 111, 112, 113, 115, 116, 117, 118, 119, 120, 121, 123, 124, 125, 126, 127, 128, 129, 131, 132, 133, 134, 135, 136, 137, 138, 139, 141, 142, 143, 144, 147, 148 and 149.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

3. The conspiracy counts fail to state a cause of action.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

4. The authorities had probable cause for the arrest.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

5. The Defendant, Alexander J. Caro, was not engaged as a participant in the Plaintiff's arrest as alleged in the complaint.

**WHEREFORE**, Defendants demand judgment dismissing the complaint, together with attorney's fees, costs and disbursements of this action.

Dated: Mattituck, New York  
January 30, 2018



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